

SANTA MONICA MOUNTAINS CONSERVANCY

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April 30, 2007

Dan Klemann, Senior Planner
County of Ventura
Resource Management Agency, Planning Division
800 South Victoria Avenue, l#1740
Ventura, California 93009

Comments on Coastal Planned Development Permit Case No. LU06-0088, 11300 Yerba Buena Road, Little Sycamore Canyon Watershed

Dear Mr. Klemann:

The Santa Monica Mountains Conservancy (Conservancy) reviewed the Notice of Proposed Project for the Coastal Planned Development Permit Case No. LU06-0088, 11300 Yerba Buena Road, Little Sycamore Canyon Watershed. The project consists of the construction of an approximately 4,310 square foot single family dwelling, garage, pool, decks, patio, and a new approximately 15-foot-wide, 2,200-foot-long driveway from Yerba Buena Road. The northeast corner of the project site abuts National Park Service parkland. The Conservancy concurs with the National Park Service comments (April 20, 2007 letter) regarding whether the property is suitable for public use and whether an agency is planning to acquire the property.

Of note, to be consistent with the Local Coastal Program, and as part of the California Environmental Quality Act (CEQA) process, the Conservancy recommends that project alternatives be explored that would reduce the length of the driveway. Alternative locations for the house should be considered along the proposed road alignment, which are closer to Yerba Buena Road. This would reduce impacts to the planned Coastal Slope Trail and would reduce fragmentation of habitat and loss of native habitat.

In order to protect the habitat values located on the project site from future degradation from piece-meal development or activities, we recommend that the full remainder of the site that would not be developed under this coastal development permit application be permanently protected. This is the only way to ensure that the CEQA environmental review process is comprehensive and not done in a piece-meal fashion. Our preferred method for this permanent protection is in the form of a conservation easement, to be granted to an agency such as Mountains Recreation and Conservation Authority. The other method is a permanent deed restriction. The key is that the protection of the remainder of the

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property must be permanently protected. The specific location of any permanently protected open space must be shown in the CEQA document and therefore be included as a mitigation measure in the CEQA document.

The sensitivity of the subject site adjacent to the Pacific Coast Highway corridor, scenic Yerba Buena Road, and the Coastal Slope Trail warrant the highest possible level of protection. A half-mile-long driveway in this scenic area is a substandard impact. Adequate nexus has been demonstrated to require a permanent deed restriction for all portions of the site that are not to be disturbed by the subject coastal development permit. Anything less would not be in the public interest.

The CEQA document should also include a map showing the locations of the vegetation communities and the extent of impacts to vegetation communities. The acreages of impact to each plant community, including to Environmentally Sensitive Habitat Areas, should be included in the document. Please provide us a copy of any CEQA document to review when it becomes available.

Thank you for notifying our agency of this project and for your consideration of these comments. Please direct any questions to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

ELIZABETH CHEADLE
Chairperson